

The Honorable Kymberly K. Evanson

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STEVEN FLOYD, et al., individually and
on behalf of all other similarly situated,

Plaintiff,

v.

AMAZON.COM INC. and APPLE INC.,

Defendants.

Case No. 2:22-cv-01599 KKE

**DECLARATION OF MARK A. PERRY
IN SUPPORT OF DEFENDANTS'
MOTION FOR COSTS AND
ATTORNEYS' FEES**

I, Mark A. Perry, declare under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a partner at the law firm Weil, Gotshal & Manges LLP (“Weil”), counsel of record for Defendant Apple Inc. (“Apple”) in this case. I am admitted to appear before this Court *pro hac vice*. I have personal, first-hand knowledge of the facts set forth in this Declaration. If called as a witness, I could and would competently testify to these facts under oath.

Weil has served as counsel of record on behalf of Apple for the Floyd litigation. Weil entered into a retention agreement with Apple in connection with the Floyd litigation. Apple agreed to pay all of Weil’s costs, fees, and expenses incurred in connection with the present suit.

2. I was personally responsible for overseeing the work relating to the Motion to Compel (Dkt. 104) and Motion for Sanctions seeking an order to show cause (Dkt. 152) (“Motions”), subject to the court’s April 10, 2025, Order (“April 10 Order,” Dkt. 203). I am

1 personally responsible for reviewing time entries detailing the work performed by Weil on
2 behalf of Apple in this Litigation.

3 **3. Entitlement to Award of Fees & Costs.** This Court ordered that “Defendants
4 may file a motion for attorney’s fees and expenses necessitated by the filing of the motion to
5 compel and the motion for discovery sanctions, no later than May 2, 2025.” Dkt. 203 at 9. This
6 Declaration, and the attached exhibits, along with Defendants’ Joint Motion for Attorneys’ Fees
7 and Costs, constitute Apple’s application for an award of its attorneys’ fees and costs in response
8 to the April 10 Order.

9 **4. Individuals Working on the Motions.** The attorneys who primarily worked on
10 the Motions were myself, Eric Hochstadt, Brian Liegel, Morgan MacBride, Geneva Hardesty,
11 Daniel Baquet, Katie Black, Shivangi Bhatia, and Kathryn Buggs. We were assisted by
12 paralegals Roy Gilchrist and Herbert Chan. The total time devoted by each person is included
13 in Exhibit A.

14 **5. Qualifications.** I am a partner at Weil, Gotshal & Manges LLP, I serve as Co-
15 Head of Weil’s Appeals and Strategic Counseling practice and am a member of the firm’s
16 Complex Commercial Litigation group. I am admitted to practice in nearly two dozen
17 jurisdictions, including the District of Columbia and the U.S. Supreme Court. I have over 30
18 years of experience in complex litigation matters, and my work has been recognized by *Legal*
19 *500*, *Benchmark Litigation*, *Best Lawyers in America*, *Law360*, *Lawdragon 500*, and others. I
20 previously served as a law clerk to Supreme Court Justice Sandra Day O’Connor, as well as
21 Judge Alex Kozinski of the Ninth Circuit Court of Appeals.

22 Eric Hochstadt was until recently a partner in Weil’s Antitrust group. He is admitted in
23 New York and New Jersey, and he served as a law clerk for the Honorable Loretta A. Preska in
24 the Southern District of New York. Eric has over 20 years of experience in complex litigation
25 and has been named one of the 500 “Leading Litigators in America” by *Lawdragon*.

26 Brian Liegel is a partner, effective January 1, 2025, in Weil’s Complex Commercial
27 Litigation and Appeals and Strategic Counseling groups. Prior to January 1, 2025, Brian was
28

1 counsel at Weil. Brian is admitted to practice in Florida, as well as numerous federal
2 jurisdictions. He has been recognized as a top Florida lawyer under 40 and consistently included
3 in the list of *Best Lawyers: Ones to Watch*. Brian is a 2015 graduate of the Georgetown
4 University Law Center and served as a law clerk for the Honorable Adalberto Jordan of the
5 Eleventh Circuit Court of Appeals.

6 Morgan MacBride is counsel in Weil's Complex Commercial Litigation group. He is
7 admitted in California and graduated with honors from Northwestern University's Pritzker
8 School of Law in 2014. He has nearly a decade of experience in complex litigation matters,
9 including multiple prior and ongoing engagements with Apple.

10 Geneva Hardesty is an Associate in Weil's Antitrust group. She is admitted to practice
11 in the District of Columbia and is a 2019 graduate of the University of Virginia School of Law.

12 Daniel Baquet is an Associate in Weil's Antitrust group. He is admitted to practice in the
13 District of Columbia and is a 2020 graduate of the University of Virginia School of Law.

14 Katie Black is a former Associate in Weil's Complex Commercial Litigation group and
15 recently began a clerkship in the Southern District of Florida. She graduated from the University
16 of Miami School of Law in 2021.

17 Shivangi Bhatia is a former Associate in Weil's Antitrust group. She previously served
18 as a law clerk in the Second Circuit Court of Appeals and on the Connecticut Supreme Court.
19 She graduated from Fordham University School of Law in 2021.

20 Kathryn Buggs is an Associate in Weil's Antitrust group. She is admitted to practice in
21 the District of Columbia and is a 2023 graduate of the University of Michigan Law School.

22 Roy Gilchrist and Herbert Chan are experienced paralegals, each with more than 20
23 years' experience.

24 **6. Total Amount of Attorneys' Fees & Costs Incurred.** As set forth below, the
25 total time Weil spent in connection with the Motions for which it seeks fees is 239.3 hours. For
26 purposes of this fee motion, Apple is seeking only a portion of the fees for Weil attorneys based
27 on rates that would be charged by Orrick, Herrington & Sutcliffe, Apple's local counsel in this
28

1 litigation. Those rates are set forth in the Declaration of Mark Parris, submitted concurrently
2 with this declaration. Accordingly, while the total amount Apple incurred was greater, Apple
3 seeks reimbursement for Weil's fees in the amount of \$137,536.00.

4 Attached as Exhibit A is a true and correct copy of the hours worked by counsel for
5 Apple on the motion to compel discovery of Floyd and the motion for sanctions and the
6 corresponding time entries. These billing records have been truncated to remove individual
7 billing narratives to remove client confidences, work product, and privileged matters. If the
8 Court deems it necessary to review detailed billing narratives for each time entry, I can
9 supplement this application with that detail for *in camera* review. I attest that the time entries in
10 Exhibit A accurately reflect my firm's services and the attorney time performed for Apple on
11 the above-referenced Motions.

12 Consistent with the information provided in Exhibit A, I summarize below in Charts A
13 and B the fees associated with the two different phases of the case for which Apple now seeks
14 reimbursement: the fees incurred in relation to Defendants' motion to compel and the fees
15 incurred in relation to Defendants' motion for sanctions. These totals also include preparation
16 for and presentation of argument at the hearings on these motions.

17 As reflected in Chart A, the fees incurred by Apple in relation to its motion to compel
18 total \$118,022.50.

Chart A: Fees Incurred In Relation to Motion to Compel

Timekeeper	Hours	Fees
Perry, Mark Andrew	7.6	\$ 6,840.00
Hochstadt, Eric S.	26.1	\$ 19,575.00
Liegel, Brian	41.0	\$ 28,495.00
MacBride, Morgan Donoian	3.3	\$ 2,293.50
Torsilieri Hardesty, Geneva	48.9	\$ 28,606.50
Baquet, Daniel A.	3.1	\$ 1,813.50
Black, Katie	49.7	\$ 22,116.50
Buggs, Kathryn	9.3	\$ 4,138.50
Gilchrist, Roy W.	14.8	\$ 4,144.00

As reflected in Chart B, the fees incurred by Apple in relation to its motion for sanctions total \$19,513.50.

Chart B: Fees Incurred In Relation to Motion for Sanctions

Timekeeper	Hours	Fees
Hochstadt, Eric S.	2.7	\$ 2,025.00
Liegel, Brian	10.7	\$ 7,436.50
MacBride, Morgan Donoian	1.2	\$ 834.00
Black, Katie	13.3	\$ 5,918.50
Bhatia, Shivangi	7.1	\$ 3,159.50
Chan, Herbert	0.5	\$ 140.00

7. **Reasonableness of Fees.** In my experience, the time incurred by Weil, Gotshal & Manges in connection with the motions was reasonable given the professional qualifications of the billers as evidenced above and the important issues presented in this nationwide antitrust

1 case. The work in connection with the Motions required significant research, drafting of the
2 Motions and replies, coordination, and presentation of argument at the motion to compel
3 hearing. For these Motions, Weil took a significant drafting role on behalf of both defendants,
4 and led the argument on the motion to compel. Apple is not requesting reimbursement for work
5 done unrelated to the Motions at issue. The result is 239.3 hours of total work which, in my
6 experience, is reasonable for the work involved in the Motions.

7 In addition, Apple is requesting hourly rates for attorneys that are reasonable based on
8 prevailing rates in this District, and which represent an amount less than the actual amount of
9 attorneys' fees Apple incurred for the work on these Motions. In connection with this fee
10 motion, Apple is seeking only a portion of the fees for Weil attorneys based on rates that would
11 be charged by Orrick, Herrington & Sutcliffe, Apple's local counsel in this litigation.
12 Additionally, as explained in the Declaration of Brian Fanning, I understand that these rates are
13 consistent with those charged by Davis Wright Tremaine, Amazon's local counsel in this
14 litigation, and further supported by a market survey of the Puget Sound area legal marketplace.
15 I also understand that these rates are consistent with those that have been approved in this
16 District in other large litigations.

17
18
19 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is
20 true and correct.

21
22 SIGNED this 2nd day of May, 2025 in Washington D.C..

23
24 By: /s/ Mark A. Perry
Mark A. Perry

EXHIBIT A

<u>Date</u>	<u>Timekeeper</u>	<u>Title</u>	<u>Law School Graduation Year</u>	<u>Hours Worked</u>	<u>Local Rate</u>	<u>Local Billed</u>
5/14/2024	Perry, Mark Andrew	Partner	1991	0.8	\$ 900.00	\$ 720.00
5/15/2024	Perry, Mark Andrew	Partner	1991	0.4	\$ 900.00	\$ 360.00
5/16/2024	Perry, Mark Andrew	Partner	1991	0.2	\$ 900.00	\$ 180.00
6/1/2024	Perry, Mark Andrew	Partner	1991	0.2	\$ 900.00	\$ 180.00
6/6/2024	Perry, Mark Andrew	Partner	1991	0.3	\$ 900.00	\$ 270.00
6/14/2024	Perry, Mark Andrew	Partner	1991	1.0	\$ 900.00	\$ 900.00
6/15/2024	Perry, Mark Andrew	Partner	1991	1.3	\$ 900.00	\$ 1,170.00
6/19/2024	Perry, Mark Andrew	Partner	1991	0.5	\$ 900.00	\$ 450.00
6/21/2024	Perry, Mark Andrew	Partner	1991	0.3	\$ 900.00	\$ 270.00
8/7/2024	Perry, Mark Andrew	Partner	1991	0.3	\$ 900.00	\$ 270.00
8/7/2024	Perry, Mark Andrew	Partner	1991	0.5	\$ 900.00	\$ 450.00
8/7/2024	Perry, Mark Andrew	Partner	1991	1.8	\$ 900.00	\$ 1,620.00
5/14/2024	Hochstadt, Eric S.	Partner	2003	0.4	\$ 750.00	\$ 300.00
5/15/2024	Hochstadt, Eric S.	Partner	2003	0.5	\$ 750.00	\$ 375.00
5/16/2024	Hochstadt, Eric S.	Partner	2003	1.4	\$ 750.00	\$ 1,050.00

<u>Date</u>	<u>Timekeeper</u>	<u>Title</u>	<u>Law School Graduation Year</u>	<u>Hours Worked</u>	<u>Local Rate</u>	<u>Local Billed</u>
5/17/2024	Hochstadt, Eric S.	Partner	2003	0.5	\$ 750.00	\$ 375.00
6/5/2024	Hochstadt, Eric S.	Partner	2003	0.4	\$ 750.00	\$ 300.00
6/6/2024	Hochstadt, Eric S.	Partner	2003	0.5	\$ 750.00	\$ 375.00
6/7/2024	Hochstadt, Eric S.	Partner	2003	0.4	\$ 750.00	\$ 300.00
6/9/2024	Hochstadt, Eric S.	Partner	2003	0.4	\$ 750.00	\$ 300.00
6/11/2024	Hochstadt, Eric S.	Partner	2003	0.4	\$ 750.00	\$ 300.00
6/14/2024	Hochstadt, Eric S.	Partner	2003	1.4	\$ 750.00	\$ 1,050.00
6/16/2024	Hochstadt, Eric S.	Partner	2003	0.2	\$ 750.00	\$ 150.00
6/18/2024	Hochstadt, Eric S.	Partner	2003	0.5	\$ 750.00	\$ 375.00
6/19/2024	Hochstadt, Eric S.	Partner	2003	0.2	\$ 750.00	\$ 150.00
6/20/2024	Hochstadt, Eric S.	Partner	2003	0.4	\$ 750.00	\$ 300.00
7/19/2024	Hochstadt, Eric S.	Partner	2003	0.2	\$ 750.00	\$ 150.00
7/22/2024	Hochstadt, Eric S.	Partner	2003	0.2	\$ 750.00	\$ 150.00
7/24/2024	Hochstadt, Eric S.	Partner	2003	0.1	\$ 750.00	\$ 75.00
7/30/2024	Hochstadt, Eric S.	Partner	2003	0.3	\$ 750.00	\$ 225.00

<u>Date</u>	<u>Timekeeper</u>	<u>Title</u>	<u>Law School Graduation Year</u>	<u>Hours Worked</u>	<u>Local Rate</u>	<u>Local Billed</u>
8/3/2024	Hochstadt, Eric S.	Partner	2003	1.2	\$ 750.00	\$ 900.00
8/4/2024	Hochstadt, Eric S.	Partner	2003	1.6	\$ 750.00	\$ 1,200.00
8/5/2024	Hochstadt, Eric S.	Partner	2003	5.3	\$ 750.00	\$ 3,975.00
8/6/2024	Hochstadt, Eric S.	Partner	2003	3.9	\$ 750.00	\$ 2,925.00
8/7/2024	Hochstadt, Eric S.	Partner	2003	5.1	\$ 750.00	\$ 3,825.00
8/16/2024	Hochstadt, Eric S.	Partner	2003	0.6	\$ 750.00	\$ 450.00
10/1/2024	Hochstadt, Eric S.	Partner	2003	1.2	\$ 750.00	\$ 900.00
10/2/2024	Hochstadt, Eric S.	Partner	2003	0.2	\$ 750.00	\$ 150.00
10/3/2024	Hochstadt, Eric S.	Partner	2003	0.4	\$ 750.00	\$ 300.00
10/21/2024	Hochstadt, Eric S.	Partner	2003	0.5	\$ 750.00	\$ 375.00
10/22/2024	Hochstadt, Eric S.	Partner	2003	0.1	\$ 750.00	\$ 75.00
10/23/2024	Hochstadt, Eric S.	Partner	2003	0.2	\$ 750.00	\$ 150.00
10/24/2024	Hochstadt, Eric S.	Partner	2003	0.1	\$ 750.00	\$ 75.00
5/14/2024	MacBride, Morgan Donoian	Counsel	2014	0.5	\$ 695.00	\$ 347.50
5/15/2024	MacBride, Morgan Donoian	Counsel	2014	0.1	\$ 695.00	\$ 69.50

<u>Date</u>	<u>Timekeeper</u>	<u>Title</u>	<u>Law School Graduation Year</u>	<u>Hours Worked</u>	<u>Local Rate</u>	<u>Local Billed</u>
5/16/2024	MacBride, Morgan Donoian	Counsel	2014	0.2	\$ 695.00	\$ 139.00
6/5/2024	MacBride, Morgan Donoian	Counsel	2014	0.2	\$ 695.00	\$ 139.00
6/6/2024	MacBride, Morgan Donoian	Counsel	2014	0.1	\$ 695.00	\$ 69.50
6/9/2024	MacBride, Morgan Donoian	Counsel	2014	0.2	\$ 695.00	\$ 139.00
6/14/2024	MacBride, Morgan Donoian	Counsel	2014	0.2	\$ 695.00	\$ 139.00
6/19/2024	MacBride, Morgan Donoian	Counsel	2014	0.2	\$ 695.00	\$ 139.00
6/20/2024	MacBride, Morgan Donoian	Counsel	2014	0.1	\$ 695.00	\$ 69.50
8/7/2024	MacBride, Morgan Donoian	Counsel	2014	1.5	\$ 695.00	\$ 1,042.50
8/28/2024	MacBride, Morgan Donoian	Counsel	2014	0.2	\$ 695.00	\$ 139.00
9/2/2024	MacBride, Morgan Donoian	Counsel	2014	0.2	\$ 695.00	\$ 139.00
10/2/2024	MacBride, Morgan Donoian	Counsel	2014	0.1	\$ 695.00	\$ 69.50
10/4/2024	MacBride, Morgan Donoian	Counsel	2014	0.1	\$ 695.00	\$ 69.50
10/21/2024	MacBride, Morgan Donoian	Counsel	2014	0.2	\$ 695.00	\$ 139.00
10/22/2024	MacBride, Morgan Donoian	Counsel	2014	0.1	\$ 695.00	\$ 69.50
10/23/2024	MacBride, Morgan Donoian	Counsel	2014	0.2	\$ 695.00	\$ 139.00

<u>Date</u>	<u>Timekeeper</u>	<u>Title</u>	<u>Law School Graduation Year</u>	<u>Hours Worked</u>	<u>Local Rate</u>	<u>Local Billed</u>
10/24/2024	MacBride, Morgan Donoian	Counsel	2014	0.1	\$ 695.00	\$ 69.50
5/10/2024	Liegel, Brian	Counsel	2015	2.6	\$ 695.00	\$ 1,807.00
5/13/2024	Liegel, Brian	Counsel	2015	4.4	\$ 695.00	\$ 3,058.00
5/14/2024	Liegel, Brian	Counsel	2015	1.4	\$ 695.00	\$ 973.00
5/15/2024	Liegel, Brian	Counsel	2015	2.9	\$ 695.00	\$ 2,015.50
5/16/2024	Liegel, Brian	Counsel	2015	3.2	\$ 695.00	\$ 2,224.00
5/17/2024	Liegel, Brian	Counsel	2015	3.2	\$ 695.00	\$ 2,224.00
6/4/2024	Liegel, Brian	Counsel	2015	2.0	\$ 695.00	\$ 1,390.00
6/10/2024	Liegel, Brian	Counsel	2015	0.4	\$ 695.00	\$ 278.00
6/11/2024	Liegel, Brian	Counsel	2015	1.4	\$ 695.00	\$ 973.00
6/12/2024	Liegel, Brian	Counsel	2015	0.3	\$ 695.00	\$ 208.50
6/13/2024	Liegel, Brian	Counsel	2015	3.8	\$ 695.00	\$ 2,641.00
6/14/2024	Liegel, Brian	Counsel	2015	2.8	\$ 695.00	\$ 1,946.00
6/19/2024	Liegel, Brian	Counsel	2015	0.3	\$ 695.00	\$ 208.50
6/20/2024	Liegel, Brian	Counsel	2015	0.2	\$ 695.00	\$ 139.00

<u>Date</u>	<u>Timekeeper</u>	<u>Title</u>	<u>Law School Graduation Year</u>	<u>Hours Worked</u>	<u>Local Rate</u>	<u>Local Billed</u>
6/21/2024	Liegel, Brian	Counsel	2015	1.1	\$ 695.00	\$ 764.50
7/23/2024	Liegel, Brian	Counsel	2015	0.9	\$ 695.00	\$ 625.50
7/29/2024	Liegel, Brian	Counsel	2015	1.2	\$ 695.00	\$ 834.00
8/2/2024	Liegel, Brian	Counsel	2015	0.9	\$ 695.00	\$ 625.50
8/5/2024	Liegel, Brian	Counsel	2015	1.8	\$ 695.00	\$ 1,251.00
8/6/2024	Liegel, Brian	Counsel	2015	1.9	\$ 695.00	\$ 1,320.50
8/7/2024	Liegel, Brian	Counsel	2015	3.7	\$ 695.00	\$ 2,571.50
8/16/2024	Liegel, Brian	Counsel	2015	0.6	\$ 695.00	\$ 417.00
8/26/2024	Liegel, Brian	Counsel	2015	0.4	\$ 695.00	\$ 278.00
8/28/2024	Liegel, Brian	Counsel	2015	0.7	\$ 695.00	\$ 486.50
9/19/2024	Liegel, Brian	Counsel	2015	0.8	\$ 695.00	\$ 556.00
9/20/2024	Liegel, Brian	Counsel	2015	0.5	\$ 695.00	\$ 347.50
10/1/2024	Liegel, Brian	Counsel	2015	3.2	\$ 695.00	\$ 2,224.00
10/2/2024	Liegel, Brian	Counsel	2015	0.4	\$ 695.00	\$ 278.00
10/3/2024	Liegel, Brian	Counsel	2015	2.6	\$ 695.00	\$ 1,807.00

<u>Date</u>	<u>Timekeeper</u>	<u>Title</u>	<u>Law School Graduation Year</u>	<u>Hours Worked</u>	<u>Local Rate</u>	<u>Local Billed</u>
10/4/2024	Liegel, Brian	Counsel	2015	0.9	\$ 695.00	\$ 625.50
10/22/2024	Liegel, Brian	Counsel	2015	0.6	\$ 695.00	\$ 417.00
10/23/2024	Liegel, Brian	Counsel	2015	0.3	\$ 695.00	\$ 208.50
10/25/2024	Liegel, Brian	Counsel	2015	0.3	\$ 695.00	\$ 208.50
5/14/2024	Torsilieri Hardesty, Geneva	Associate	2019	0.5	\$ 585.00	\$ 292.50
5/16/2024	Torsilieri Hardesty, Geneva	Associate	2019	0.4	\$ 585.00	\$ 234.00
6/7/2024	Torsilieri Hardesty, Geneva	Associate	2019	0.3	\$ 585.00	\$ 175.50
6/9/2024	Torsilieri Hardesty, Geneva	Associate	2019	0.1	\$ 585.00	\$ 58.50
6/10/2024	Torsilieri Hardesty, Geneva	Associate	2019	0.2	\$ 585.00	\$ 117.00
6/10/2024	Torsilieri Hardesty, Geneva	Associate	2019	0.8	\$ 585.00	\$ 468.00
6/11/2024	Torsilieri Hardesty, Geneva	Associate	2019	0.4	\$ 585.00	\$ 234.00
6/11/2024	Torsilieri Hardesty, Geneva	Associate	2019	2.6	\$ 585.00	\$ 1,521.00
6/12/2024	Torsilieri Hardesty, Geneva	Associate	2019	7.3	\$ 585.00	\$ 4,270.50
6/13/2024	Torsilieri Hardesty, Geneva	Associate	2019	0.4	\$ 585.00	\$ 234.00
6/14/2024	Torsilieri Hardesty, Geneva	Associate	2019	3.0	\$ 585.00	\$ 1,755.00

<u>Date</u>	<u>Timekeeper</u>	<u>Title</u>	<u>Law School Graduation Year</u>	<u>Hours Worked</u>	<u>Local Rate</u>	<u>Local Billed</u>
6/15/2024	Torsilieri Hardesty, Geneva	Associate	2019	1.0	\$ 585.00	\$ 585.00
6/16/2024	Torsilieri Hardesty, Geneva	Associate	2019	0.2	\$ 585.00	\$ 117.00
6/18/2024	Torsilieri Hardesty, Geneva	Associate	2019	0.3	\$ 585.00	\$ 175.50
6/18/2024	Torsilieri Hardesty, Geneva	Associate	2019	0.6	\$ 585.00	\$ 351.00
6/19/2024	Torsilieri Hardesty, Geneva	Associate	2019	0.6	\$ 585.00	\$ 351.00
6/20/2024	Torsilieri Hardesty, Geneva	Associate	2019	4.1	\$ 585.00	\$ 2,398.50
6/21/2024	Torsilieri Hardesty, Geneva	Associate	2019	0.2	\$ 585.00	\$ 117.00
6/21/2024	Torsilieri Hardesty, Geneva	Associate	2019	1.8	\$ 585.00	\$ 1,053.00
7/16/2024	Torsilieri Hardesty, Geneva	Associate	2019	3.3	\$ 585.00	\$ 1,930.50
7/17/2024	Torsilieri Hardesty, Geneva	Associate	2019	2.9	\$ 585.00	\$ 1,696.50
7/18/2024	Torsilieri Hardesty, Geneva	Associate	2019	0.5	\$ 585.00	\$ 292.50
7/19/2024	Torsilieri Hardesty, Geneva	Associate	2019	0.2	\$ 585.00	\$ 117.00
7/22/2024	Torsilieri Hardesty, Geneva	Associate	2019	3.3	\$ 585.00	\$ 1,930.50
7/23/2024	Torsilieri Hardesty, Geneva	Associate	2019	1.0	\$ 585.00	\$ 585.00
7/24/2024	Torsilieri Hardesty, Geneva	Associate	2019	1.4	\$ 585.00	\$ 819.00

<u>Date</u>	<u>Timekeeper</u>	<u>Title</u>	<u>Law School Graduation Year</u>	<u>Hours Worked</u>	<u>Local Rate</u>	<u>Local Billed</u>
7/29/2024	Torsilieri Hardesty, Geneva	Associate	2019	0.5	\$ 585.00	\$ 292.50
7/29/2024	Torsilieri Hardesty, Geneva	Associate	2019	2.8	\$ 585.00	\$ 1,638.00
7/30/2024	Torsilieri Hardesty, Geneva	Associate	2019	0.2	\$ 585.00	\$ 117.00
8/5/2024	Torsilieri Hardesty, Geneva	Associate	2019	0.8	\$ 585.00	\$ 468.00
8/5/2024	Torsilieri Hardesty, Geneva	Associate	2019	4.9	\$ 585.00	\$ 2,866.50
8/6/2024	Torsilieri Hardesty, Geneva	Associate	2019	1.6	\$ 585.00	\$ 936.00
8/7/2024	Torsilieri Hardesty, Geneva	Associate	2019	0.7	\$ 585.00	\$ 409.50
5/16/2024	Baquet, Daniel A.	Associate	2020	2.1	\$ 585.00	\$ 1,228.50
5/17/2024	Baquet, Daniel A.	Associate	2020	1.0	\$ 585.00	\$ 585.00
10/22/2024	Bhatia, Shivangi	Associate	2021	1.3	\$ 445.00	\$ 578.50
10/23/2024	Bhatia, Shivangi	Associate	2021	1.0	\$ 445.00	\$ 445.00
10/24/2024	Bhatia, Shivangi	Associate	2021	0.5	\$ 445.00	\$ 222.50
10/25/2024	Bhatia, Shivangi	Associate	2021	0.3	\$ 445.00	\$ 133.50
11/1/2024	Bhatia, Shivangi	Associate	2021	2.8	\$ 445.00	\$ 1,246.00
11/4/2024	Bhatia, Shivangi	Associate	2021	1.2	\$ 445.00	\$ 534.00

<u>Date</u>	<u>Timekeeper</u>	<u>Title</u>	<u>Law School Graduation Year</u>	<u>Hours Worked</u>	<u>Local Rate</u>	<u>Local Billed</u>
5/16/2024	Black, Katie	Associate	2021	3.2	\$ 445.00	\$ 1,424.00
5/17/2024	Black, Katie	Associate	2021	0.2	\$ 445.00	\$ 89.00
6/3/2024	Black, Katie	Associate	2021	0.1	\$ 445.00	\$ 44.50
6/5/2024	Black, Katie	Associate	2021	2.7	\$ 445.00	\$ 1,201.50
6/6/2024	Black, Katie	Associate	2021	0.2	\$ 445.00	\$ 89.00
6/7/2024	Black, Katie	Associate	2021	0.5	\$ 445.00	\$ 222.50
6/8/2024	Black, Katie	Associate	2021	0.9	\$ 445.00	\$ 400.50
6/8/2024	Black, Katie	Associate	2021	1.3	\$ 445.00	\$ 578.50
6/10/2024	Black, Katie	Associate	2021	2.1	\$ 445.00	\$ 934.50
6/18/2024	Black, Katie	Associate	2021	0.8	\$ 445.00	\$ 356.00
6/19/2024	Black, Katie	Associate	2021	4.2	\$ 445.00	\$ 1,869.00
6/20/2024	Black, Katie	Associate	2021	1.1	\$ 445.00	\$ 489.50
6/21/2024	Black, Katie	Associate	2021	2.1	\$ 445.00	\$ 934.50
7/11/2024	Black, Katie	Associate	2021	0.3	\$ 445.00	\$ 133.50
7/16/2024	Black, Katie	Associate	2021	0.3	\$ 445.00	\$ 133.50

<u>Date</u>	<u>Timekeeper</u>	<u>Title</u>	<u>Law School Graduation Year</u>	<u>Hours Worked</u>	<u>Local Rate</u>	<u>Local Billed</u>
7/18/2024	Black, Katie	Associate	2021	4.0	\$ 445.00	\$ 1,780.00
7/19/2024	Black, Katie	Associate	2021	4.6	\$ 445.00	\$ 2,047.00
7/22/2024	Black, Katie	Associate	2021	1.7	\$ 445.00	\$ 756.50
7/23/2024	Black, Katie	Associate	2021	1.8	\$ 445.00	\$ 801.00
7/24/2024	Black, Katie	Associate	2021	3.4	\$ 445.00	\$ 1,513.00
7/25/2024	Black, Katie	Associate	2021	3.9	\$ 445.00	\$ 1,735.50
8/1/2024	Black, Katie	Associate	2021	2.7	\$ 445.00	\$ 1,201.50
8/4/2024	Black, Katie	Associate	2021	1.3	\$ 445.00	\$ 578.50
8/5/2024	Black, Katie	Associate	2021	0.8	\$ 445.00	\$ 356.00
8/5/2024	Black, Katie	Associate	2021	3.8	\$ 445.00	\$ 1,691.00
8/6/2024	Black, Katie	Associate	2021	1.2	\$ 445.00	\$ 534.00
8/7/2024	Black, Katie	Associate	2021	0.2	\$ 445.00	\$ 89.00
8/7/2024	Black, Katie	Associate	2021	0.3	\$ 445.00	\$ 133.50
8/21/2024	Black, Katie	Associate	2021	1.6	\$ 445.00	\$ 712.00
8/27/2024	Black, Katie	Associate	2021	1.6	\$ 445.00	\$ 712.00

<u>Date</u>	<u>Timekeeper</u>	<u>Title</u>	<u>Law School Graduation Year</u>	<u>Hours Worked</u>	<u>Local Rate</u>	<u>Local Billed</u>
8/28/2024	Black, Katie	Associate	2021	5.5	\$ 445.00	\$ 2,447.50
8/29/2024	Black, Katie	Associate	2021	1.9	\$ 445.00	\$ 845.50
8/30/2024	Black, Katie	Associate	2021	1.8	\$ 445.00	\$ 801.00
9/3/2024	Black, Katie	Associate	2021	0.7	\$ 445.00	\$ 311.50
9/4/2024	Black, Katie	Associate	2021	0.1	\$ 445.00	\$ 44.50
9/20/2024	Black, Katie	Associate	2021	0.1	\$ 445.00	\$ 44.50
5/30/2024	Buggs, Kathryn	Associate	2023	2.4	\$ 445.00	\$ 1,068.00
5/31/2024	Buggs, Kathryn	Associate	2023	0.3	\$ 445.00	\$ 133.50
6/10/2024	Buggs, Kathryn	Associate	2023	2.5	\$ 445.00	\$ 1,112.50
6/11/2024	Buggs, Kathryn	Associate	2023	3.5	\$ 445.00	\$ 1,557.50
6/12/2024	Buggs, Kathryn	Associate	2023	0.1	\$ 445.00	\$ 44.50
6/13/2024	Buggs, Kathryn	Associate	2023	0.5	\$ 445.00	\$ 222.50
10/4/2024	Chan, Herbert	Paralegal		0.5	\$ 280.00	\$ 140.00
5/16/2024	Gilchrist, Roy W.	Paralegal		3.7	\$ 280.00	\$ 1,036.00
5/17/2024	Gilchrist, Roy W.	Paralegal		2.3	\$ 280.00	\$ 644.00

<u>Date</u>	<u>Timekeeper</u>	<u>Title</u>	<u>Law School Graduation Year</u>	<u>Hours Worked</u>	<u>Local Rate</u>	<u>Local Billed</u>
6/20/2024	Gilchrist, Roy W.	Paralegal		5.4	\$ 280.00	\$ 1,512.00
6/21/2024	Gilchrist, Roy W.	Paralegal		0.7	\$ 280.00	\$ 196.00
7/11/2024	Gilchrist, Roy W.	Paralegal		2.7	\$ 280.00	\$ 756.00
Total				239.3		\$ 137,536.00